

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LAWRENCE J. KONCELIK, JR.,)	
)	
Plaintiff,)	Civil Action No. 08-C-623
)	
v.)	Judge: Bucklo
)	Magistrate Judge: Nolan
SUNBEAM PRODUCTS, INC.)	
d/b/a JARDEN CONSUMER)	
SOLUTIONS)	
)	
Defendant.)	

**DEFENDANT'S MOTION TO STAY PROCEEDINGS
PENDING REEXAMINATION OF PATENT-IN-SUIT**

Defendant Sunbeam Products, Inc. d/b/a Jarden Consumer Solutions (“Sunbeam”), by and through its attorneys, moves this Court for an Order to stay these proceedings related to U.S. Patent No. 7,096,766 (the “‘776 Patent”) asserted by plaintiff Lawrence J. Koncelik, Jr. pending the resolution of reexamination of the ‘776 Patent by the United States Patent and Trademark Office. Sunbeam contemporaneously files herewith a memorandum in support of this motion and incorporates that memorandum as if fully set forth herein.

WHEREFORE, Defendant Sunbeam Products, Inc. d/b/a Jarden Consumer Solutions respectfully requests that this Court to stay these proceedings pending the resolution of reexamination of the ‘776 Patent by the United States Patent and Trademark Office, and to confer any further relief that the Court deems just and appropriate.

Dated: August 14, 2008

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this the 14th of August, 2008, the foregoing was served by operation of the Court's electronic filing system and/or first-class U.S. mail, postage prepaid, upon the following:

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